

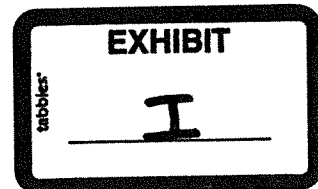
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

ANITA ARRINGTON-BEY, etc.,)
)
Plaintiff,)
)
v.) Case No. 1:14-CV-02514
) Judge Patricia A. Gaughan
THE CITY OF BEDFORD HEIGHTS,)
et al.,)
)
Defendants.)

THE DEPOSITION OF CAROLYN HILL
FRIDAY, APRIL 17, 2015

The deposition of CAROLYN HILL, a witness, called for examination by the Plaintiffs, under the Federal Rules of Civil Procedure, taken before me, Kristine M. Esber, a Notary Public in and for the State of Ohio, pursuant to notice, at the offices of Friedman & Gilbert, 55 Public Square, Suite 1055, Cleveland, Ohio, commencing at 10:10 a.m., the day and date above set forth.

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1 Q. Okay. What time did you come on duty that day?

2 A. **Seven o'clock in the morning.**

3 Q. And that's first shift?

4 A. **Yes.**

5 Q. At 7:00 a.m. to 3:00?

6 A. **3:00.**

7 Q. When did you first see Omar Bey?

8 A. **When Officer Honsaker brought him in.**

9 Q. Okay. Where were you at when Mr. Bey came in?

10 A. **In the booking area.**

11 Q. And was anybody else with you?

12 A. **Yes. My supervisor Cynthia Lee.**

13 Q. Did you talk to Officer Honsaker about Omar when
14 he came in with him?

15 A. **Yes. I asked him what his charge is. He said
16 he wasn't sure yet.**

17 Q. Anything else?

18 A. **He said we might want to keep the handcuffs on
19 him for a while. I asked him, for what? And he said
20 he just been rambling on in the back of his car,
21 talking nonsense, and that's it.**

22 Q. Did Officer Honsaker tell you or Ms. Lee that
23 Omar was on psychiatric medication?

24 A. **I can't recall him telling us that.**

25 Q. Anything else that you remember Officer Honsaker

1 telling you about Omar?

2 **A. No, other than where he picked him up at.**

3 Q. And what did he tell you about that?

4 **A. He picked him up at -- I believe it was Lowe's.**
5 **And why he picked him up; he was being disorderly.**

6 Q. Do you know what he was doing at -- did Officer
7 Honsaker tell you what he was doing at Lowe's?

8 **A. Just being disorderly.**

9 Q. You had no knowledge of Omar Bey before that
10 day?

11 **A. No.**

12 Q. When you saw him coming in, was he handcuffed?

13 **A. Yes.**

14 Q. And can you describe his demeanor or behavior?

15 **A. He was kind of agitated, lightweight cussing**
16 **Officer Honsaker.**

17 Q. I'm sorry?

18 **A. Lightweight cussing Officer Honsaker for**
19 **arresting him.**

20 Q. Anything else that you noticed about him?

21 **A. No.**

22 Q. When you say agitated, what do you mean by that?

23 **A. He was upset he was being arrested.**

24 Q. Did you talk to him at all; did you have a
25 conversation with him?

1 **A.** **At the time, no. When he first brought him in,**
2 **no.**

3 Q. Did you think any of that behavior you just
4 described was indicative of mental health problems?

5 **A.** **What does indicative mean?**

6 Q. A sign.

7 **A.** **No.**

8 Q. Okay. So who did the booking of Omar?

9 **A.** **Officer Mudra.**

10 Q. Right when he came in?

11 **A.** **No.**

12 Q. When was that?

13 **A.** **On second shift.**

14 Q. Why didn't you do the booking?

15 **A.** **Because by him being agitated, it was only two**
16 **females on the unit, and we wasn't going to take the**
17 **chance of him acting out on us.**

18 Q. So you made the decision not to book him and
19 screen him?

20 **A.** **Yes.**

21 Q. Did you call Assistant Chief Leonardi to tell
22 him your problem?

23 **A.** **Yes.**

24 Q. And what did he say?

25 **A.** **He said until he calms down, leave him in there.**

1 Q. So you made the initial decision that you and
2 Ms. Lee weren't going to book him --

3 **A. Not until he calmed down.**

4 Q. -- because he was agitated, right?

5 **A. Yes. Not until he calmed down.**

6 Q. But you're saying that the assistant chief who
7 is the jail administrator confirmed that you should not
8 book him until he calms down?

9 **A. Yes.**

10 Q. Did Leonardi tell you to notify any Mobile
11 Crisis or Recovery Resources to come in and take a look
12 at him?

13 **A. No.**

14 Q. When he was brought in handcuffed was there a
15 search?

16 **A. Yes. We called Officer Burton over to search
17 him.**

18 Q. And what was found in the search?

19 **A. I don't remember.**

20 Q. Do you remember if there were any pills on him?

21 **A. They told me there was. I didn't find any on
22 him.**

23 Q. Well, you didn't search him, right?

24 **A. I'm not allowed to search him.**

25 Q. Who told you there were pills on him?

1 because of the agitation until he cools down, the pills
2 just sit there either in the booking area or maybe
3 they're sent upstairs, right?

4 **A. They wouldn't be sent upstairs until he's**
5 **processed.**

6 Q. And when you say processed, you mean the booking
7 process, correct?

8 **A. Yes.**

9 Q. So the pills sit in the booking area --

10 **A. With his property.**

11 Q. -- with his property, and nothing is done with
12 those pills until there's a booking process, correct?

13 **A. Or unless there's a nurse there. If the nurse**
14 **is there at the time, then we'll give the pills to her**
15 **and she can identify them.**

16 Q. And if there is no nurse there at the time,
17 those pills just sit there?

18 **A. With his property.**

19 Q. And in Omar's case there was no nurse on duty,
20 correct?

21 **A. Not when he came in.**

22 Q. And if a nurse is not on duty who do you call?

23 **A. For what?**

24 Q. For a medical issue.

25 **A. Depending on the medical issue.**

1 **A. She didn't tell me anything.**

2 Q. Okay. So what happened to Omar after he was
3 brought in?

4 **A. He was led to the interview cell, put in there,**
5 **took the handcuffs off. We asked him for his belt and**
6 **everything.**

7 Q. And how was he behaving?

8 **A. He wanted to do a little strip tease for us.**

9 Q. And you didn't find that to be unusual?

10 **A. No.**

11 Q. Did he take his clothes off?

12 **A. No. He started taking his clothes off.**

13 Q. And did you tell him not to do it?

14 **A. Yes.**

15 Q. And he was dancing?

16 **A. Yes.**

17 Q. Was he in a happy state or a --

18 **A. At that time he was.**

19 Q. And then so the handcuffs were taken off. And
20 do you know approximately what time this was during the
21 day?

22 **A. No, I don't.**

23 Q. Was it in the morning?

24 **A. It was in the morning.**

25 Q. Okay. And did Honsaker leave at that point, if

1 Q. You're not concerned?

2 A. No. Just that day I was.

3 Q. But I think you said that there were other times
4 you were concerned.

5 A. Yes, other times.

6 Q. For the same situation?

7 A. Not the same situation. No.

8 Q. Similar?

9 A. Similar.

10 Q. Okay. I'm only asking you have you ever made
11 that concern known to the jail administrator?

12 A. No.

13 Q. All right. So Omar is put in that cell and when
14 you left him -- and I think it was the interview room,
15 right?

16 A. Yes.

17 Q. -- was there any other behavioral problems that
18 you noticed during the day or during your shift?

19 A. No.

20 Q. What was he doing?

21 A. Just sitting there talking to himself. Trying
22 to flirt with us.

23 Q. What was he saying; did you make it out?

24 A. He was talking about some million dollar song or
25 something, contract or something.

1 Q. Okay. Did you know that he had worked at
2 Lowe's?

3 A. When I read the report, yes.

4 Q. But not at the time?

5 A. Not at the time.

6 Q. Okay. What else was he talking to himself
7 about?

8 A. I can't recall. That I remember, just the
9 million dollar song or record deal he was talking
10 about, because he tried to rap.

11 Q. Was he rapping?

12 A. He called himself rapping.

13 Q. Did he call himself a thug?

14 A. No. Not that I can recall.

15 Q. What did he say about being a rapper?

16 A. I don't remember. He was just rapping.

17 Q. Was he actually rapping?

18 A. He call himself rapping. It depend on what you
19 call rapping, talking, --

20 Q. I don't know.

21 A. -- singing.

22 Q. Was he singing?

23 A. Singing, rapping, talking; yeah, I guess.

24 Q. Do you remember what he was singing about?

25 A. No.